

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

US Bank Trust, N.A., as Trustee of the
American Homeowner Preservations Trust
Series 2015A+

Case No. 1:22-cv-00249

Plaintiff

-vs-

City of Buffalo, New York, et al.

Defendant.

**PLAINTIFF'S UNOPPOSED MOTION TO EXTEND
CLASS CERTIFICATION FACT DISCOVERY**

Plaintiff moves the Court for an order extending the deadline to complete class certification fact discovery in this case. Plaintiff requests that the deadline for class certification fact discovery be extended to October 31, 2022. The additional time is required to fully develop a complete factual record for consideration of class certification.

The requested extension will not disrupt any other dates in the case's current schedule.

Class certification motion deadline is January 30, 2023.

Counsel has consulted with David Lee, counsel for Defendants, who has indicated he has no objection to the requested extension and consents to the relief requested.

For the foregoing reasons, Plaintiff requests that the Court extend the deadline for class certification fact discovery until October 31, 2022.

Respectfully submitted,

/s/ Marc E. Dann
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Counsel for Plaintiff

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing was served by email upon David Lee, Esq. dlee@ch.ci.buffalo.ny.us this 30th day of August 2022.

/s/ Marc E. Dann
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